

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

ERIC CAINE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 11-CV-08996
	)	
JON BURGE, JAMES PIENTA,	)	Honorable Judge Durkin
RAYMOND MADIGAN, WILLIAM	)	
MARLEY, WILLIAM PEDERSON,	)	
DANIEL MCWEENY, CITY OF	)	
CHICAGO and UNIDENTIFIED	)	
EMPLOYEES OF THE CITY OF	)	
CHICAGO,	)	JURY TRIAL DEMANDED
	)	
Defendants.	)	

**PLAINTIFF'S EXHIBITS IN SUPPORT OF  
LOCAL RULE 56.1 STATEMENT OF ADDITIONAL FACTS**

- Exhibit 1: Caine Certificate of Innocence
- Exhibit 2: Eric Caine Deposition Dated February 7, 2013
- Exhibit 3: Record of Proceedings, *People v. Patterson*, September 25, 1989,  
Eric Caine Trial Testimony
- Exhibit 4: Order Granting Certificate of Innocence to Aaron Patterson
- Exhibit 5: Aaron Patterson Deposition, *Patterson v. Burge*,  
Dated December 8, 2005
- Exhibit 6: Supplementary Report Dated April 21, 1986
- Exhibit 7: Supplementary Report Dated May 7, 1986
- Exhibit 8: Jon Burge Deposition Dated December 18, 2012
- Exhibit 9: Raymond Madigan Deposition Dated May 12, 2012
- Exhibit 10: Daniel McWeeny Deposition Dated August 8, 2012

- Exhibit 11: William Pedersen Deposition Dated July 10, 2012
- Exhibit 12: William Marley Deposition Dated May 29, 2012
- Exhibit 13: James Pienta Deposition Dates May 22, 2012
- Exhibit 14: Jon Burge Response to Interrogatory #1
- Exhibit 15: Jon Burge Response to Interrogatory #2
- Exhibit 16: Raymond Madigan Response to Interrogatory #1
- Exhibit 17: Raymond Madigan Response to Interrogatory #2
- Exhibit 18: Daniel Mcweeny Response to Interrogatory #1
- Exhibit 19: Daniel Mcweeny Response to Interrogatory #2
- Exhibit 20: William Pedersen Response to Interrogatory #1
- Exhibit 21: William Pedersen Response to Interrogatory #2
- Exhibit 22: William Marley Response to Interrogatory #1
- Exhibit 23: William Marley Response to Interrogatory #2
- Exhibit 24: James Pienta Response to Interrogatory #1
- Exhibit 25: James Pienta Response to Interrogatory #2
- Exhibit 26: Jon Burge Answer to Complaint
- Exhibit 27: Raymond Madigan Answer to Complaint
- Exhibit 28: Daniel McWeeny Answer to Complaint
- Exhibit 29: William Pedersen Answer to Complaint
- Exhibit 30: William Marley Answer to Complaint
- Exhibit 31: James Pienta Answer to Complaint
- Exhibit 32: Jon Burge Personnel Record (Filed Under Seal)

- Exhibit 33: Transcript of Proceedings, *United States v. Burge*, Jon Burge Testimony, Dated June 17, 2010
- Exhibit 34: Findings and Decision, Before the Police Board of the City of Chicago, In re Jon Burge, No. 91-1856
- Exhibit 35: Deposition of Jon Burge in *Wilson v. City of Chicago*, Dated September 22, 1988
- Exhibit 36: Court Reported Statement of Lonza Homes, Dated April 19, 2004
- Exhibit 37: Report of Proceedings, *Homes v. The People of The State of Illinois*, Testimony of Jon Burge, Dated Feb. 24, 1986
- Exhibit 38: Report of Proceedings, *People v. Mumin*, Testimony of Jon Burge, Dated May 13, 1987
- Exhibit 39: Initial Incident Report Dated April 19, 1986
- Exhibit 40: Report of Proceedings, *People v. Patterson*, Testimony of Dennis McGuire, Dated Sept. 19, 1989
- Exhibit 41: Memorandum from William Marley and James Pienta to Jon Burge
- Exhibit 42: Court Appearance Authorizations
- Exhibit 43: General Progress Reports
- Exhibit 44: Affidavit of Michael Arbuckle, *People v. Patterson*
- Exhibit 45: Deposition of Michael Arbuckle, *People v. Patterson*, Dated November 19, 2004
- Exhibit 46: Affidavit of Aaron Patterson
- Exhibit 47: Report of Proceedings, *People v. Patterson*, Testimony of Aaron Patterson, Dated March 3, 1988
- Exhibit 48: Report of Proceedings, *People v. Patterson*, Testimony of Peter Troy, Dated Sept. 22, 1989

- Exhibit 49: Unsigned Statement Attributed to Aaron Patterson,  
Eric Caine's Signed Statement
- Exhibit 50: Affidavit of Ike Carothers, *People v. Patterson*
- Exhibit 51: Deposition of Richard Burnette Dated January 10, 2013
- Exhibit 52: Report of Proceedings, *People v. Patterson*, Testimony of James  
Pienta, Dated Sept. 20, 1989
- Exhibit 53: Deposition of Eric Caine, *Patterson v. Burge*,  
Dated January 18, 2005
- Exhibit 54: Affidavit of Dr. Ross W. Romine
- Exhibit 55: Report of Proceedings, *People v. Patterson*, Initial Appearance of  
Caine and Patterson, Dated May 2, 1986
- Exhibit 56: Affidavit of Illya Rowland Affidavit
- Exhibit 57: Deposition of Illya Rowland, *Patterson v. Burge*,  
Dated November 24, 2004
- Exhibit 58: State's Response to Discovery Request
- Exhibit 59: Report of Proceedings, *People v. Caine*, Testimony of Peter Troy  
Dated Sept. 26, 1989
- Exhibit 60: Report of Proceedings, *People v. Caine, Closing Arguments*,  
Sept. 26, 1989
- Exhibit 61: Reports of Goldston and Sanders
- Exhibit 62: Memorandum of Opinion, In the Circuit Court of Cook  
County, Appeal from Discharge Order Before the Police Board
- Exhibit 63: OPS Report Closing Number of Allegations as Unsustained
- Exhibit 64: OPS Report Regarding Eric Smith's Allegations
- Exhibit 65: Terry Harris OPS statement
- Exhibit 66: Diggins Statement

- Exhibit 67: Report of the Special Prosecutor Part A
- Exhibit 68: Report of the Special Prosecutors Part B
- Exhibit 69: Report of the Special Prosecutors Part C
- Exhibit 70: Report of the Special Prosecutors Part D
- Exhibit 71: Report of the Special Prosecutors Part E
- Exhibit 72: Report of the Special Prosecutors Part F
- Exhibit 73: Report of the Special Prosecutors Part G
- Exhibit 74: Report of the Special Prosecutors Part H
- Exhibit 75: Report of the Special Prosecutors Part I
- Exhibit 76: Report of the Special Prosecutors Part J
- Exhibit 77: Report of the Special Prosecutors Part K
- Exhibit 78: Report of the Special Prosecutors Part L
- Exhibit 79: Report of the Special Prosecutors Part M
- Exhibit 80: Report of the Special Prosecutors Part N
- Exhibit 81: Report of the Special Prosecutors Part O
- Exhibit 82: Report of the Special Prosecutors Part P
- Exhibit 83: Report of the Special Prosecutors Part Q
- Exhibit 84: Report of the Special Prosecutors Part R
- Exhibit 85: Commendations (Filed Under Seal)
- Exhibit 86: Memorandum and Order In Re Appointment of  
Special Prosecutor, Dated May 19, 2006
- Exhibit 87: City Memorandum in Opposition to Motion to Bar Testimony,  
Dated Jan. 22, 1992

- Exhibit 88: Statement of Mayor Richard M. Daley
- Exhibit 89: Darrell Cannon OPS File
- Exhibit 90: Philip Adkins OPS File
- Exhibit 91: Gregory Banks OPS File
- Exhibit 92: Stanley Howard OPS File
- Exhibit 93: Michael Johnson OPS Report
- Exhibit 94: LC Riley Testimony, Dated Mar. 13, 1987
- Exhibit 95: Affidavit of Leanoard Kidd
- Exhibit 96: Report of Proceedings, *People v. Holmes*, Testimony of Lonza Holmes, Dated Dec. 12, 1985 and Report of Proceedings, Testimony of Lonza Holmes, Dates June 26, 1986
- Exhibit 97: Report of Proceedings, *People v. Andrews*, Testimony of James Andrews, Dated Oct. 1, 1984
- Exhibit 98: Report of Proceedings, *People v. Coleman*, Testimony of Michael Coleman, Dated Nov. 20, 1980
- Exhibit 99: Court-Reported Statement of Anthony Holmes
- Exhibit 100: Transcript of Proceedings, Judge Lefkow Sentencing Jon Burge, Dated Jan. 21, 2011
- Exhibit 101: Transcript of Proceedings, Adam Green Testimony, Filed July 1, 2011
- Exhibit 102: Affidavit of Flint Taylor
- Exhibit 103: Chicago Police Department Statistics for 1973
- Exhibit 104: Chicago Police Department Statistics for 1974
- Exhibit 105: Chicago Police Department Statistics for 1975
- Exhibit 106: Chicago Police Department Statistics for 1976

Exhibit 107: Chicago Police Department Statistics for 1977

Exhibit 108: Chicago Police Department Statistics for 1978

Exhibit 109: Chicago Police Department Statistics for 1979

Exhibit 110: Chicago Police Department Statistics for 1980

Exhibit 111: Chicago Police Department Statistics for 1981

Exhibit 112: Chicago Police Department Statistics for 1982

Exhibit 113: Chicago Police Department Statistics for 1983

Exhibit 114: Chicago Police Department Statistics for 1984

Exhibit 115: Chicago Police Department Statistics for 1985

Exhibit 116: Chicago Police Department Statistics for 1986

Exhibit 117: Order of Hon. Paul Biebel Appointing Special Prosecutor,  
Dated April 11, 2013

RESPECTFULLY SUBMITTED,

/s/ David B. Owens

David B. Owens

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**CERTIFICATE OF SERVICE**

I, Russell Ainsworth, an attorney, certify that I served the foregoing Exhibit List to all Counsel of Record by electronic means on April 15, 2013.

/s/ David B. Owens  
David B. Owens  
*Counsel for Plaintiff*